

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ANN COYLE, on behalf of herself and  
all other similarly situated persons,

Plaintiff,

Y.

AVENT AMERICA, INC.; PHILIPS  
 ELECTRONICS NORTH AMERICA  
 CORPORATION; GERBER PRODUCTS  
 COMPANY; HANDI-CRAFT COMPANY;  
 NALGE NUNC INTERNATIONAL CORP.;  
 PLAYTEX PRODUCTS, INC.

Case No. 08-3407

Judge James F. Holderman

Magistrate Judge Cox

Defendants.

**UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO  
ANSWER OR OTHERWISE PLEAD PENDING DECISION ON  
CONSOLIDATION BEFORE THE MDL PANEL**

Defendant Philips Electronics North America Corporation (PENAC), by its attorneys and pursuant to Federal Rule of Civil Procedure 6(b), requests an extension of time to answer or otherwise plead to Plaintiff's Complaint. In support of the Motion, PENAC states as follows:

1. On June 12, 2008, Plaintiff filed her Complaint. PENAC was served on July 23, 2008, and PENAC's answer is due on August 22, 2008.
2. On or about June 20, 2008, Plaintiff filed a motion with the Panel on Multidistrict Litigation ("MDL Panel") to join an already pending motion to transfer and consolidate this action pursuant to 28 U.S.C. § 1407 with a number of similar putative class actions and "tag-along" actions pending in various United States district courts.

3. The MDL Panel held a hearing on the motion to transfer on July 31, 2008. At the hearing, Plaintiff joined Defendants in their request to consolidate the actions in district court in Missouri or Kansas. The MDL Panel has not yet ruled on the motion.

4. PENAC therefore requests an extension of time to answer or otherwise plead until thirty days after the MDL Panel rules on the motion to transfer and consolidate.

5. Counsel for Plaintiff has informed PENAC's counsel that Plaintiff has no objection to this Motion.

6. An extension of time is in the interest of judicial economy because it will allow PENAC to answer one consolidated complaint, instead of multiple complaints. The motion is not made for purposes of delay, nor will an extension of time prejudice Plaintiff.

7. Moreover, this same extension was granted to Defendants Avent America, Inc. on July 29, 2008 and Playtex Products, Inc. on August 5, 2008.

WHEREFORE, for the reasons stated above, Defendant Phillips Electronic North America Corporation respectfully requests that this Court allow them an extension of time to answer or otherwise plead to the Complaint until thirty days after the MDL Panel has ruled on the motions to transfer and consolidate, and for any other relief this Court deems just and equitable.

Dated: August 11, 2008

Respectfully submitted,

/s/ Kristen E. Hudson

One of the Attorneys for Defendant  
Philips Electronics North America  
Corporation

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**CERTIFICATE OF SERVICE**

I, Kristen E. Hudson, an attorney, hereby certify that on August 11, 2008, I electronically filed the foregoing **Unopposed Motion for an Extension of Time to Answer or Otherwise Plead Pending Decision on Consolidation Before the MDL Panel** using the Court's CM/ECF system, which will automatically send electronic notification of such filing to the following individuals:

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/s/ Kristen E. Hudson